

Exhibit 04

Lollar, Tirzah

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Tuesday, November 8, 2022 7:55 PM
To: Lollar, Tirzah; Heather Hacker; Reeder-Ricchetti, Emily; Raymond Winter; Hilton, Christopher
Cc: Amy Hilton; Margolis, Craig D.; Odell, Christopher M.; zzz.External.lgodesky@omm.com; zzz.External.jchapa@omm.com; zzz.External.asantella@omm.com; Pieper, Megan; Martin, Meghan C.; Gerstner, Alyssa; zzz.External.rgalin@omm.com; Ramer, Paula; zzz.External.dashby@omm.com
Subject: Re: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah,

You can present Ms. Linton on the 22nd or seek a protective order.

Andrew

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Sent: Tuesday, November 8, 2022 6:51:00 PM
To: Heather Hacker <heather@hackerstephens.com>; Andrew Stephens <andrew@hackerstephens.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Hilton, Christopher <Christopher.Hilton@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com <lgodesky@omm.com>; jchapa@omm.com <jchapa@omm.com>; asantella@omm.com <asantella@omm.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; dashby@omm.com <dashby@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Heather:

Linton is not available on Nov 22. As for finding a date in the discovery period, we of course see our back and forth about the Linton deposition differently. But in order to try to avoid motions practice, we have looked again at the schedule and can offer to present Linton on Nov 28 in DC. We know you will already be in DC for depositions Nov 28-Nov 30. And there is only 1 deposition currently on the calendar on Nov 28, unlike many other dates where there are 2 depositions already scheduled (including for example, Nov 30). Please let us know if Nov 28 in DC will work.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

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From: Heather Hacker <heather@hackerstephens.com>

Sent: Tuesday, November 8, 2022 6:46 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Andrew Stephens <andrew@hackerstephens.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Hilton, Christopher <Christopher.Hilton@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>

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External E-mail

Tirzah,

Relator is standing on the valid deposition notice issued to Melaney Linton for November 22, 2022. We attempted to work with you for weeks on an alternative date for her deposition after you said she was unavailable but you refused to provide a date within the discovery period and instead said she was unavailable in Texas until December 8. Ms. Linton is an officer of a party and if she fails to show for her scheduled deposition she and PPGC will be subject to sanctions under FRCP 37.

Thanks,
Heather

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Friday, November 4, 2022 3:51 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Hilton, Christopher <Christopher.Hilton@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>; dashby@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Ray:

Looking ahead to the Rossiter deposition next week, please let us know the names of folks from your teams that we should add to our security list, and the name of the court reporting company. In addition, all visitors, including court reporter and videographer, will need to sign the attached health attestation on the day of the depo.

I also wanted to follow up to see if you have figured out if you can do the Linton depo on Dec 8, 9, or 10 in Houston.

Thanks,
Tirzah